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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte; Transforming the 2.5 GHz Band, WT Docket No. 18-120

Dear Ms. Dortch:

On Wednesday, October 24, 2018, Jim Lyon, General Manager, and Jonathan Hills, Wireless Network Manager, of Mark Twain Communications Company (“Mark Twain”) and their counsel, Clare Liedquist, Molly O’Conor, and the undersigned with Herman & Whiteaker, LLC, met with Matthew Pearl, John Schauble, Catherine Schroeder, Blaise Scinto, Dana Shaffer, Nadja Sodos-Wallace and Nancy Zaczek, and with the Wireless Telecommunications Bureau of the Federal Communications Commission (“FCC” or “Commission”). During the meeting, Mr. Lyon and Mr. Hills discussed the importance of the *Transforming the 2.5 GHz Band* proceeding, particularly for small, rural commercial providers.

Mr. Lyon described how Mark Twain is a small, rural telecommunications provider that serves northeast Missouri and currently holds EBS and BRS licenses. Mr. Hills described the success that Mark Twain has had with licensed 2.5 GHz spectrum and Mr. Lyon discussed the excellent relationship that Mark Twain has enjoyed with the schools in its service area.

Mr. Hills and Mr. Lyon expressed support for the local priority windows, explaining that it provides an opportunity to get valuable 2.5 GHz spectrum into the hands of local carriers that have an interest in deploying. Mr. Hills and Mr. Lyon explained how an auction, on the other hand, would hurt small commercial providers like Mark Twain because they are unable to compete financially against larger providers. In addition to the local priority windows, Mr. Hills

expressed support for more aggressive build out requirements in order to prevent spectrum warehousing.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned docket. Please contact the undersigned if you have any questions.

Respectfully submitted,



Donald L. Herman, Jr.
Clare Liedquist
Molly O'Connor
*Counsel to Mark Twain Communications
Company*

Cc: Matthew Pearl (via email)
John Schauble (via email)
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